



INFORMED

Health Alliance FLASH: Supplement to 3/27 COVID-19 Email Regarding Telehealth

April 2, 2020

This notice is intended to supplement the March 24 and March 27 emails sent last week, in which Health Alliance and Health Alliance Northwest announced the temporary broadening of telehealth codes to cover additional services, including behavioral health therapy, in response to the COVID-19 pandemic.

As the prior email indicated, telehealth services should be properly coded with the appropriate procedure code (CPT or HCPCS). **However, since our last email, new regulatory guidance has been issued regarding what Place of Service (POS) codes should be used.** The new guidance provides additional flexibility during the COVID-19 pandemic.

Here is the new guidance:

- **For non-traditional telehealth services (i.e. the new telehealth codes temporarily covered during the COVID-19 public health emergency):** When billing professional claims for non-traditional telehealth services with dates of services on or after March 1, 2020 and through the duration of the temporary public emergency declarations in each State or federal jurisdiction, providers can bill with the **POS code equal to what it would have been in the absence of the emergency declarations, but adding a modifier -95** to indicate that the service rendered was actually performed via telehealth. By billing the POS in this way, reimbursement will be based on how you typically performed these services, prior to the temporary declarations.
- **For traditional telehealth services (i.e. services already defined and covered as telehealth prior to the COVID-19 public health emergency declarations):** When billing professional claims for traditional telehealth services, providers **should still use a POS code of 02 (Telehealth)**. This indicates that the billed service was furnished as a professional telehealth service from a distant site. There is no change to the facility/non-facility payment differential applied based on POS. Claims submitted with POS code 02 will continue to pay at the facility rate.

For the most up-to-date list of the expanded (*i.e.* non-traditional) and traditional telehealth codes, please visit <https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes>.

Please note that these developments are, in many cases, temporary and subject to change in light of additional federal, state and industry directives and guidance. Additionally, these developments may not apply to all self-funded plans, since coverage specifics vary by employer.

Do not hesitate to reach out to us if you have any questions. Also, as before, we invite our provider network to visit our [COVID-19 webpage](#) for up-to-date information about the illness, our response and questions about coverage. Thank you.